



California State Fire Marshal **CODE INTERPRETATION**

Date Issued	03-18-03	Interpretation #	03-018
Topic	Group R, Divisions 2.1.1 and 2.2.1		
Code Section(s)	§1267.8, 13143, 13195, 13113.7(2) and 1275, California Health and Safety Code		
Requested by	K Chin Altos Care, Inc. 2492 Aram Ave San Jose, CA 95128		

1. ***Considering the provisions of §1267.8(a) of the California Health and Safety Code, are commercial or residential standards for fire and life safety, egress and accessibility applicable to Group R, Division 2.1.1 occupancies when the code is interpreted by local plan checkers and fire inspectors?***

Only those regulations that have been adopted by the State Fire Marshal shall apply to fire and life safety, egress and accessibility.

2. ***Should local fire inspectors (or planners) cite commercial or residential standards when inspecting a Group R, Division 2.1.1 occupancy?***

No. Commercial standards do not apply to Group R, Division 2 occupancies. The Health and Safety Code requires that these facilities model as closely as possible to a Group R, Division 3 occupancy.

3. ***Considering the provisions of §1267.8 of the Health and Safety Code, what are the closest occupancy standards for life safety, egress and accessibility that “special occupancy” fire department planners and inspectors should be using when inspecting a Group R, Division 2.1.1 occupancy (i.e. can local fire departments apply commercial standards)?***

Fire inspectors and plan checkers shall only apply local ordinances for restrictions on building heights, setback, lot dimensions, or placement of signs as long as such restrictions are identical to those applied to other single-family residences.

4. ***Considering Section 13143 of the Health and Safety Code, in Group R, Division 2.2.1 occupancies are illuminated exit signs required above all exit doors and in hallways to indicate the exit path of egress (including illuminated exit signs in all client bedrooms that have a direct exit to the exterior and illuminated hallway exit signs indicating which bedrooms have direct exits to the exterior?***

No. Exit signs indicating which bedrooms have direct exits to the exterior are not required in this type of occupancy.

5. ***Considering Section 13143.8 of the Health and Safety Code, can the local fire department require stricter “commercial” fire life safety standards for egress, life safety and accessibility in Group R, Division 2.1.1 occupancies than required by the SFM?***

No.

6. ***Considering §13195 of the Health and Safety Code, in Group R, Division 2.2.1 occupancies (non-ambulatory) are fire sprinklers and a monitored fire sprinkler system that conform to NFPA #13-D required? If required, does the monitored sprinkler system need two dedicated telephone lines for monitoring? Does the monitored system require quarterly inspections by the alarm company (equivalent to a commercial system)?***

No. There are no requirements in the Health and Safety Code or in the California Building Code requiring a sprinkler system in Group R, Division 2.2.1 occupancies that house six or fewer clients.

7. ***Considering §13113.7(2) of the Health and Safety Code, can the local building or fire department require in-room smoke detectors in all rooms in Group R, Division 2.1.1 facilities that already have monitored fire alarms with a NFPA-13D fire sprinkler system? Has this requirement been waived by the State Fire Marshal?***

No. Local ordinances are not applicable to Group R, Division 2 occupancies. Only those regulations adopted by the State Fire Marshal are applicable.

8. *Considering §19956 of the Health and Safety Code, are handrails required on ADA compliant walkways sloped 1:20 or greater? Can handrails be required by the Department of Health Services for licensing purposes? Are handrails required on landings that are less than 30 inches above grade?*

The State Fire Marshal does not regulate the application of American's with Disabilities Act.

9. *Considering §1275 of the Health and Safety Code, can the Department of Health Services amend or apply stricter (e.g. commercial) fire standards for egress and life safety for Group R, Division-2.1.1 than what is specified by the State Fire Marshal (including accessibility/ramp requirements, etc.)?*

No.